

2:04 pm, Aug 05 2024

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY R.C. Deputy

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

TAVOY FARQUHARSON,

Defendant.

CASE NO. 1:24-mj-1895-CDA

FILED UNDER SEAL

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Dennis Senft ("Affiant"), Special Agent with the Department of the Treasury, Office of the Inspector General, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Department of the Treasury, Office of the Inspector General ("TIG"). I have been employed as a Special Agent with TIG since 2024. I was previously a Special Agent with Homeland Security Investigations ("HSI"), from 2007 to 2024, assigned to the HSI Baltimore, Maryland, High Intensity Drug Trafficking Area ("HIDTA"), Drug and Money Laundering Initiative ("DMLI"). The HIDTA-DMLI investigates drug and money laundering organizations in the District of Maryland and elsewhere and is responsible for the enforcement of federal laws.

2. I am "an investigative or law enforcement officer" of the United States within the meaning of 18 U.S.C. § 2510(7) and am empowered by law to conduct investigations and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

3. I have attended training in financial and narcotics investigations, such as transnational elder fraud, bulk cash smuggling, and money laundering. I have also received training in methods to

trace illegal proceeds and prove financial crimes, asset forfeiture, and financial investigations, including but not limited to, financial fraud. In my training and experience, I have become familiar with the methods and techniques associated with the laundering of illicit proceeds, and the organization of complex conspiracies.

4. As a federal agent, I am authorized to investigate violations of laws of the United States and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States. I am assigned to this investigation and my involvement has included, among other activities, interviewing witnesses, conducting surveillance, and reviewing financial records. This investigation is being conducted jointly by TIG, HSI and the United States Postal Inspection Service ("USPIS").

5. Your Affiant, along with others, is conducting a financial fraud investigation involving Wayne HENRY ("WAYNE"), Dwayne HENRY ("DWAYNE"), Tavoy FARQUHARSON ("FARQUHARSON"), and other individuals identified and not yet identified (hereafter collectively referred to as the "TARGETS").

6. This affidavit is made in support of a criminal complaint charging FARQUHARSON with conspiracy to commit mail fraud, in violation of 18 U.S.C. § 1349, and related arrest warrant.

7. Based on my training and experience and the facts set forth in this affidavit, I respectfully submit that there is probable cause to believe that FARQUHARSON is engaged with WAYNE and DWAYNE, and others known and unknown, in a conspiracy to commit mail fraud. Specifically, FARQUHARSON and his co-conspirators have caused victims, including older adult victims, to believe that they have won a lottery or sweepstakes and must provide payment in advance for taxes or other fees, before they can collect their winnings. In doing so, FARQUHARSON and

his co-conspirators have caused victims to be solicited for the scheme using the mail, and also to send payment to the TARGETS and their co-conspirators using the mail.

8. The statements contained in this affidavit are based, in part, on information provided to me by other law enforcement officers, either directly or indirectly through their reports or affidavits, and surveillance conducted by law enforcement officers. The facts in this Affidavit come from my personal observations, training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter. All conversations and statements described in this affidavit are related in substance and in part unless otherwise indicated. This affidavit is not intended to include each and every fact and matter observed by me or known to the government relating to the subject matter of the investigation. Instead, this affidavit contains only those facts which are necessary to establish that probable cause exists.

PROBABLE CAUSE

Background on Lottery and Sweepstakes Schemes

9. The TARGETS have operated a lottery scheme since approximately 2020. In a lottery scheme, perpetrators persuade victims that they have won a lottery or sweepstakes. To claim their prize or winnings, the victim must pay taxes or other fees in advance. The perpetrators may tell the victim that the winnings are being held due to fees that are due and owing, legal issues, or customs disputes. In this way, the perpetrators convince the victims to send cash or checks through the U.S. Mail or other interstate commercial carrier, such as UPS or FedEx, purchase prepaid debit or gift cards, wire money through financial institutions, or make over-the-counter deposits directly into bank accounts controlled by the perpetrators. The contests and prizes are not real, and the victims never realize any winnings.

10. To mask the identity of the scheme originators, the perpetrators will use a network of individuals known as “runners” or “money mules.” Money mules may be witting, complicit, or unwitting victims. A money mule will receive money directly from victims, other money mules, or perpetrators and then deliver, mail, transfer or wire the money to other money mules or other scheme participants. The money mule is usually paid a portion of the funds as a fee. This process effectively launders the proceeds of the fraud to conceal it from law enforcement. The victims believe they are sending the money to a company associated with the contest, a financial institution, or U.S. Government agency.

11. The investigation to date has revealed that during the approximate time period from November 2020 through January 2024, numerous victims in and around the United States have sent the TARGETS of the investigation approximately \$12 million. For instance, victim A.K. resides in Baltimore County, Maryland and advised that he was a victim of a lottery scheme between February 2021 and September 2022. A.K. sent over \$650,000 primarily to unknown scheme participants by purchasing and sending cashier’s checks, through wire transfers, and by providing gift card information over the phone. One of the gift cards that A.K. purchased was used to fund a PayPal account registered to WAYNE. PayPal’s servers are located outside the State of Maryland. When A.K.’s gift card funds were deposited to the PayPal account registered to WAYNE, an interstate transmission of electronic data resulted. According to PayPal, WAYNE has multiple accounts. One of the phone numbers associated with one of WAYNE’s PayPal accounts is 240-722-2078.

12. Subscriber information obtained from T-Mobile revealed that 240-722-2078 is active and subscribed to WAYNE at 13919 Westview Forest Drive, Bowie, Maryland 20720. The account was established on January 27, 2020.

13. A second victim, J.S. resides in Alaska and advised law enforcement that he was a victim of a lottery scheme which began in approximately November 2020. J.S. explained that over the next few years, he was convinced to send over \$7 million to pay taxes and other fees on his purported "winnings."

14. On March 2, 2023, members of the Maryland State Police Metropolitan Area Drug Task Force were contacted by FedEx security in reference to a shipment which contained \$50,000 in U.S. Currency. The U.S. Currency was all \$100 bills and was concealed inside a hollowed-out children's coloring book along with a presumed false IRS declaration form. The FedEx parcel, tracking #3952 3159 5934, was addressed to "Anthony Henry" at 9810 Apollo Drive, Upper Marlboro, Maryland 20774, which is a Walgreens store. Walgreens offers a FedEx pickup service which allows customers to pick up parcels at the store locations so long as the identification they show matches the name on the parcel. The parcel was sent from J.S. The TARGETS of the investigation caused the victim to send the parcel via FedEx, a commercial interstate carrier.

15. FedEx provided multiple IP addresses which tracked parcel #3952 3159 5934. Many of the IP addresses originated in Jamaica. Your affiant knows, based upon training and experience, that Jamaica is a source country for lottery schemes.

16. In addition, according to publicly-available "whois" records, three of the IP addresses which also tracked the parcel, namely 2601:14b:4180:b420:2976:81c0:3bb2:2914, 2601:14b:4180:b420:d90e:f20f:24a0:3ff4 and 2601:14b:4180:b420:283b:fdea:f50d:1da4, showed a location in Hyattsville, Maryland and are owned by Comcast. According to assignment records obtained from Comcast, those IP addresses were assigned to WAYNE's Comcast account at the address where he and DWAYNE reside in Landover Hills, Maryland, as follows:

Wayne A. Henry

4446 68th Place Apt. A2
Landover Hills, MD 20782
Telephone # 240-722-2078

17. FedEx's servers are located outside of the State of Maryland. When the tracking number for the cash parcel sent by J.S. was queried from Hyattsville, Maryland, this resulted in the interstate transmission of electronic data via FedEx's out-of-state servers.

18. According to records provided by FedEx, J.S. sent two additional parcels to WAYNE. Both parcels were sent to another Walgreens at 6130 Baltimore Ave, Riverdale, Maryland 20737, on September 21, 2022, Tracking# 2782 5442 3960 and on September 28, 2022, Tracking #2785 2388 2926.

19. WAYNE opened Truist Bank account #XXXXX3141 ("Truist 3141") on December 15, 2021, using mailing address as 13919 West View Forest Drive, Bowie Maryland 20720, and phone number 240-722-2078. WAYNE listed himself as "self-employed" in the account opening documents. A review of the Truist 3141 bank records showed approximately \$75,000 in cash deposits. A review of Truist 3141 also revealed that WAYNE received peer-to-peer ("P2P") transfers, which were then almost immediately remitted via additional P2P transfers. Many of the P2P transactions are in round, even amounts and the source of the funds is unknown. Your Affiant knows, based on training and experience, that the rapid movement of even dollar amounts of currency is indicative of money laundering, specifically the layering of illegal proceeds.

20. Phone number 240-722-2078 is also listed on an M&T Bank account #XXXXXXX1382 ("M&T 1382") which was opened by WAYNE in or about August 2022 using the Bowie mailing address listed above. A review of the M&T 1382 bank records showed approximately \$87,000 in cash deposits and P2P transfers. The deposits occurred from approximately January 2022 to January 2023, when the account was closed by the bank. A review of M&T 1382 also revealed that most of

the ATM cash withdrawals occurred in Jamaica. As explained above, your affiant knows, based upon training and experience, that Jamaica is a source country for financial schemes targeting older adults, including lottery schemes.

21. According to information provided by Zelle, both WAYNE and DWAYNE have active accounts. From January 16, 2020, to October 26, 2023, WAYNE sent approximately 60 transactions to DWAYNE, totaling approximately \$7,470. From January 2, 2020, to October 31, 2023, DWAYNE sent approximately 563 transactions to WAYNE, totaling approximately \$50,810.

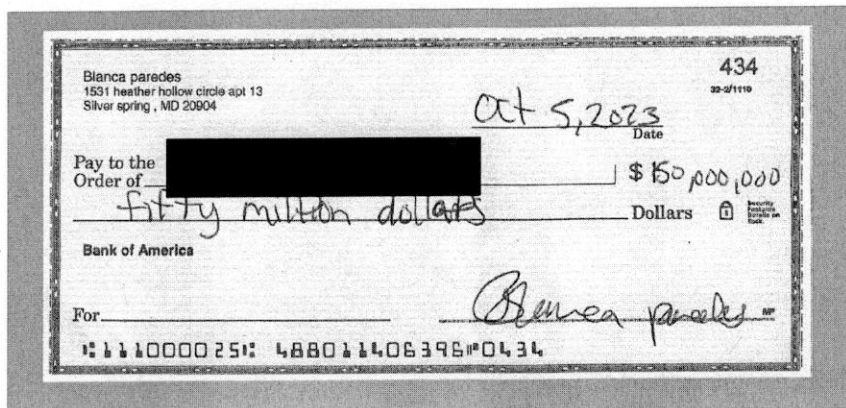
THE ALASKA PARCELS

22. Comcast provided all IP addresses associated with WAYNE's Comcast account at 4446 68th Place Apt. 2A, Landover Hills, Maryland 20784 ("the Landover Hills residence") from January 1, 2023, to present: IP address 73.39.221.138 was associated with the account from August 24, 2023, to October 3, 2023. According to USPS records, 73.39.221.138 tracked one parcel between August 24, 2023, and October 3, 2023, namely tracking # EI084380875US. According to the records, that parcel was purchased in Washington, D.C. and was delivered to the address which belongs to J.S. in Alaska. The parcel was paid for using debit card #4143-XXXX-XXXX-9584.

23. According to USPS records, two additional parcels were mailed from the Landover Hills Post Office, 7400 Buchanan Street, Hyattsville, Maryland 20784 to J.S.'s residence in Alaska. Parcel EI600828725US was purchased on October 6, 2023, also with debit card #4143-XXXX-XXXX-9584. Parcel EI600829085US was purchased on October 16, 2023. Numerous IP addresses tracked both parcels prior to them being delivered. According to Comcast records, most of the IP addresses that tracked the parcels belonged to the account associated with WAYNE and the Landover Hills residence.

24. According to J.S. the three parcels showed up at his residence unsolicited. USPS parcel EI084380875US, which was sent in August, contained a cell phone. USPS parcel EI600828725US, which was sent on October 6, 2023, contained a typed note and a check made payable to J.S in the amount of \$150 million. Images of the note and check are set forth below.

Please give me a call [REDACTED] I need to talk to you regarding your payment so I can deposit 150 million in your account. Please call 7024489391 As soon as possible.



25. USPS parcel EI600829085US, which was sent on October 16, 2023, contained a cell phone, a typed note and a check made out to J.S. in the amount of \$150 million. Images of the note and check are set forth below.

im the supervisor trying to get in touch with you about paying you the 150 million dollars. Please give me a call at 702-448-9391.i will give you a phone so you can call me with it.i try to reach out to you but your phone seems like it not working properly. I want to have the funds transfer to you as soon as possible. Make sure the phone I give you it charged and always bring it with you.

Blanca paredes
1531 Heather hollow circle apt 13
Silver spring, MD 20904

435
92-2/1110

Oct 16, 2023
Date

Pay to the
Order of

\$ 150,000.00

One hundred fifty thousand
Dollars

Bank of America

For

1111000025: 48801140639610435

26. On November 16, 2023, your affiant and investigators conducted surveillance at the Landover Hills residence. At 10:32 AM, investigators observed WAYNE exit the apartment and depart in the vehicle registered to DWAYNE, a gold 2013 Nissan sedan bearing Virginia registration USC1798. At approximately 12:20 PM, WAYNE was observed entering the Staples store located at 7933 Annapolis Road, Lanham Maryland 20706. WAYNE retrieved a small bubble envelope from

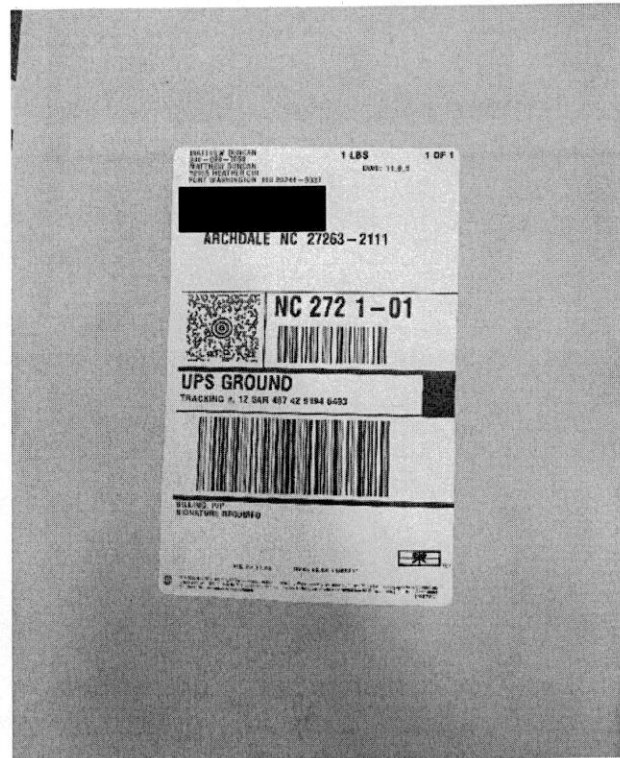
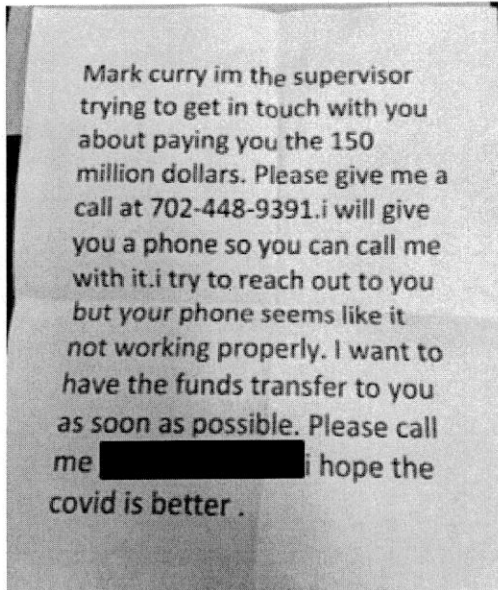
the shelf and approached the UPS counter within the store. Staples is an authorized shipper for UPS. WAYNE removed a piece of paper from his pocket and placed it into the envelope. WAYNE paid for the parcel and left the store.

27. After WAYNE departed the Staples store in the vehicle, an investigator made contact with the Print and Marketing Supervisor inside the store. The supervisor stated that WAYNE had been coming into the store for approximately 2 years and conducting shipments utilizing an account under the name "Matthew Duncan", an address of 12905 Heather Cir, Fort Washington, Maryland 20744, and phone number 240-899-7058. Open-source queries revealed that there is no record of Duncan or the phone number at 12905 Heather Cir, Fort Washington, Maryland 20744. The supervisor further stated that when WAYNE would come in to ship an item, WAYNE would first provide his phone number, 240-899-7058. The supervisor advised that the UPS parcel that WAYNE shipped, tracking number 1Z5AR4874291946493, was to suspected victim J.M. in Archdale, North Carolina.

28. The Supervisor advised that WAYNE has previously shipped different sized parcels to individuals around the country, and specifically remembered him shipping suitcases. The supervisor showed investigators a screen shot of another parcel shipped by WAYNE on July 14, 2023, to victim J.P. in Oakridge, Oregon, with UPS box tracking number 1Z5AR4870198952826.

29. On November 19, 2023, your Affiant conducted an interview of J.M. at his residence in North Carolina. J.M. provided investigators consent to open the UPS parcel with tracking number 1Z5AR4874291946493.

30. On November 20, 2023, investigators opened the UPS parcel with tracking number 1Z5AR4874291946493. Inside the parcel was a typed letter addressed to J.M. An image of the letter and envelope are set forth below.



31. Based on your affiant's knowledge and experience, and similarities between the letters (the same contact phone number provided to J.S. and J.M., the same IP address tracked both packages, and surveillance observations), your affiant believes that the co-conspirators, WAYNE and/or DWAYNE, shipped letters to both J.S. in Alaska and J.M. in North Carolina.

32. On November 27, 2023, investigators, including your affiant, conducted a telephonic interview of J.P. in Oregon regarding the UPS box with tracking number 1Z5AR4870198952826 shipped on July 14, 2023. J.P. stated that she was contacted sometime in early 2023 and advised that she won \$5,500,000 in a sweepstakes. J.P. was sent a metal briefcase via a UPS account used by WAYNE, which she claimed contained a partial payment of her winnings, approximately \$500,000. J.P. would receive the code to open the briefcase after sending the required fees and taxes. If she attempted to open the briefcase without the code, however, the money would be destroyed by an ink pack contained within. J.P. stated that she lost approximately \$75,000 as part of the scheme. United

States Postal Inspectors obtained the parcel box and briefcase from J.P. The label on the parcel box revealed the shipper as "Matthew Duncan," the same name used by WAYNE for the previously discussed parcel sent to J.M.

33. Below are photographs of the package and contents sent to J.P.



34. On December 5, 2023, your Affiant received information from Green Dot regarding debit card #4143-XXXX-XXXX-9584. The cardholder is suspected victim I.W. who was born in 1937 and resided in Mena, Arkansas. Additional research for suspected victim I.W. revealed an obituary for I.W. stating that I.W. had died on January 5, 2021. The information provided by Green Dot revealed that the debit card has recently been used primarily in Prince George's County, Maryland. More specifically, it is used frequently at retail and fast-food locations near the Landover Hills residence. For instance, on September 16, 2023, approximately \$460 was withdrawn via 3 sequential transactions, using the debit card at the CVS located in Landover Hills, Maryland, nearby the Landover Hills residence. Video surveillance was obtained from CVS which revealed a slim black male with a jacket over his head and wearing a mask, believed to be WAYNE based on clothing

your Affiant has observed WAYNE wear on previous surveillances, conduct transactions at the ATM located by the front door from approximately 10:21 PM to 10:24 PM, which matched the timestamp for the 3 withdrawals that was provided by Green Dot. Your Affiant believes, based on training, knowledge, experience, and the facts of this investigation, that WAYNE was using debit card #4143-XXXX-XXXX-9584 to conduct transactions related to financial fraud and that the card was obtained fraudulently from suspected victim I.W. who is deceased. Your affiant further submits that WAYNE was attempting to conceal his identity by entering the store and conducting the ATM transactions while wearing a mask with his jacket pulled up over his head.

35. On December 15, 2023, investigators conducted surveillance at the Landover Hills residence. At approximately 12:32 PM investigators observed an individual believed to be WAYNE, based on WAYNE's Maryland Driver's license photo, depart in the Gold Nissan. At approximately 12:37 PM investigators observed that vehicle arrive at the Giant store located at 7546 Annapolis Road, Lanham, Maryland 20784. WAYNE exited the Gold Nissan and entered the store. Investigators observed WAYNE conduct a transaction at the self-checkout lane. At approximately 12:53 PM WAYNE departed the store and returned to the Landover Hills residence.

36. On January 2, 2024, your Affiant received additional information from Green Dot regarding debit card #4143-XXXX-XXXX-9584. The transaction log provided by Green Dot revealed that the debit card was used on December 15, 2023, at the Giant located at 7546 Annapolis Rd, Lanham, Maryland 20784. Your affiant believes, based on training, knowledge, experience, and the facts of this investigation, that WAYNE used the debit card, believed to be obtained fraudulently, to conduct transactions at the Giant.

FARQUHARSON'S USE OF CELLULAR PHONE NUMBER 876-389-8740

37. **FARQUHARSON** is a Jamaican national, who has entered the United States on two occasions between 2021 to 2024.

38. Based on immigration related databases maintained by the Department of Homeland Security ("DHS"), in or about May 2021, **FARQUHARSON** provided the phone number 876-389-8740 as his contact number to the State Department on an Online Nonimmigrant Visa Application, Form DS-160. **FARQUHARSON** also listed his date of birth as February 8, 1992.

39. Jet Blue travel records for Tavoy **FARQUHARSON** revealed that **FARQUARSON** used phone number 876-389-8740 as a contact number for his recent trip from Jamaica to John F. Kennedy International Airport ("JFK Airport") in New York on July 20, 2024.

40. On July 20, 2024, U.S. Customs and Border Protection confirmed **FARQUARSON's** identity upon his crossing into the United States by way of JFK Airport via **FARQUARSON's** Jamaican passport, which also referenced his date of birth, that he presented at the time of inspection.

REVIEW OF INCRIMINATING ELECTRONIC EVIDENCE AND COMMUNICATIONS WITH "HOT DRUGS," a/k/a FARQUHARSON

41. On January 11, 2024, agents executed a search warrant at the Landover Hills residence, where DWAYNE and WAYNE were living. The search of the residence led to the seizure of eight (8) cellular telephones believed to be the property of WAYNE based on user accounts and data stored within the phones, which law enforcement labeled as Cell Phone 1, Cell Phone 2, Cell Phone 3, Cell Phone 4, Cell Phone 5, Cell Phone 6, Cell Phone 7, and Cell Phone 8.

42. In a conversation dated May 6, 2023, and retrieved from Cell Phone 5, a message was sent to WAYNE (aka "HEFNER") from Firstladychin Cuz, using 876-841-5978, which included an attachment labeled "New Leads 18-2-2021." The attachment labeled "New Leads 18-2-2021" is an

Excel file which includes the first and last names, phone number and complete address for approximately 1,500 individuals. Your affiant believes, based upon knowledge, training, and experience, as well as the facts developed in the investigation, that the “new leads” pertained to potential victims for lottery scheme solicitations.

18768415978@s.whatsapp.net First Lady Chin Cuz Incoming New Leads 18-2- 5/6/2023
2021

43. Cell Phone 5 also contained numerous WhatsApp chats between the user of the phone using 240-906-2525, believed to be WAYNE, and an individual called “HOT DRUGS,” who was using 876-389-8740. Based upon the information above and in the chats, your Affiant submits that “HOT DRUGS” is FARQUHARSON, as explained further below. As discussed above, in or about May 2021 and July 2024, FARQUHARSON provided this phone number to the State Department and Jet Blue.

44. WhatsApp is an application which may be installed on a mobile device that offers end to end encryption for calls and messages. The application’s encryption makes it difficult for law enforcement to access the communications, absent seizing and imaging the mobile device. Your affiant knows, based on knowledge, training, and experience, that it is common for criminals involved in fraud schemes to use WhatsApp.

45. Within Cell Phone 5 your Affiant found another WhatsApp chat, dated January 31, 2023, in which your Affiant submits WAYNE and HOT DRUGS discussed the solicitation of a financial fraud victim. HOT DRUGS asked WAYNE to send “a letter and briefcase” to a person who had \$71,000 “but [was] having cold feet at the last minute,” as follows:

18763898740@s.whatsapp.net Hot Drugs	Incoming	Awch want <u>send</u> a letter and briefcase there	1/31/2023
12409062525@s.whatsapp.net Hefner	Outgoing	Ok no problem	1/31/2023
18763898740@s.whatsapp.net Hot Drugs	Incoming	Person <u>have</u> 71 k but having cold feet at the last minute	1/31/2023
12409062525@s.whatsapp.net Hefner	Outgoing	Ok damn	1/31/2023
12409062525@s.whatsapp.net Hefner	Outgoing	What <u>bout</u> a print <u>letter</u> ?	1/31/2023
18763898740@s.whatsapp.net Hot Drugs	Incoming	Yea	1/31/2023
18763898740@s.whatsapp.net Hot Drugs	Incoming	You can mail them both	1/31/2023
12409062525@s.whatsapp.net Hefner	Outgoing	Send the letter to this email	1/31/2023
12409062525@s.whatsapp.net Hefner	Outgoing	Mooremoney097@gmail.com	1/31/2023
18763898740@s.whatsapp.net Hot Drugs	Incoming	Ok bro will let you know when it's sent	1/31/2023
12409062525@s.whatsapp.net Hefner	Outgoing	Ok	1/31/2023

46. On or about May 5 and May 6, 2023, WAYNE, using 240-906-2525, and HOT DRUGS, using 876-389-8740, exchanged WhatsApp messages in which WAYNE expressed an urgent need to speak with HOT DRUGS. Included in this conversation are two images that contained the name, address and phone number for J.S., identified above. Your affiant believes that WAYNE needed to speak urgently with HOT DRUGS regarding the package of currency sent by J.S., that was seized by law enforcement on or about March 2, 2023.

12409062525@s.whatsapp.net Hefner	18763898740@s.whatsapp.net Hot Drugs	- Outgoing	Link me asap	3/5/2023	
	Delivered: 3/5/2023 5:28:40 PM(UTC+0)				
12409062525@s.whatsapp.net Hefner	18763898740@s.whatsapp.net Hot Drugs	- Outgoing	I need to talk to you	3/5/2023	
	Delivered: 3/5/2023 5:28:45 PM(UTC+0)				
12409062525@s.whatsapp.net Hefner	18763898740@s.whatsapp.net Hot Drugs	- Outgoing		3/5/2023	
	Delivered: 3/5/2023 5:45:30 PM(UTC+0)				67f583db-6af0-4d69-a19d-b5ddd6f2ea49.jpg
18763898740@s.whatsapp.net Hot Drugs	Participants: 12409062525@s.whatsapp.net Hefner (owner), 18763898740@s.whatsapp.net Hot Drugs	Incoming	Up bro	3/5/2023	
12409062525@s.whatsapp.net Hefner	18763898740@s.whatsapp.net Hot Drugs	- Outgoing	I believe in you boss bro lol	3/5/2023	
	Delivered: 3/5/2023 8:08:02 PM(UTC+0)				
18763898740@s.whatsapp.net Hot Drugs	Participants: 12409062525@s.whatsapp.net Hefner (owner), 18763898740@s.whatsapp.net Hot Drugs	Incoming	Go do the right g	3/5/2023	
12409062525@s.whatsapp.net Hefner	18763898740@s.whatsapp.net Hot Drugs	- Outgoing		3/6/2023	
	Delivered: 3/6/2023 3:10:28 PM(UTC+0)				df545e3a-2944-403d-92f4-c645edf27e95.jpg

47. In the conversation below, on or about May 7, 2023, WAYNE, using 240-906-2525, and HOT DRUGS, using 876-389-8740, exchanged WhatsApp messages in which HOT DRUGS sent WAYNE the email address Dianejohn38@outlook.com. Cell Phone 5 also contained an email dated May 7, 2023, from WAYNE, using email address hefner4life@icloud.com, to Dianejohn38@outlook.com, and attaching a file called "New Leads 18-2-2021." A review of the excel file, the leads list, which was attached to the aforementioned message from Firstladychin Cuz, using 876-841-5978, on May 6, 2023, revealed that it contained approximately 1,500 different names, phone numbers, and addresses of individuals believed to be victims or potential victims.

18763898740@s.whatsapp.net Hot Drugs	Incoming	Yo	5/7/2023
12409062525@s.whatsapp.net Hefner	Outgoing	You ready for them?	5/7/2023
12409062525@s.whatsapp.net Hefner	Outgoing	You got the emailed	5/7/2023
12409062525@s.whatsapp.net Hefner	Outgoing	?	5/7/2023
18763898740@s.whatsapp.net Hot Drugs	Incoming	Dianejohn38@outlook.com	5/7/2023
12409062525@s.whatsapp.net Hefner	Outgoing	You see <u>it</u> ?	5/7/2023
18763898740@s.whatsapp.net Hot Drugs	Incoming	Go <u>yheck</u>	5/7/2023
12409062525@s.whatsapp.net Hefner	Outgoing	I'm <u>gonna</u> send you more tomorrow he got 2 more pages	5/7/2023
12409062525@s.whatsapp.net Hefner	Outgoing	<u>So</u> when you bingo don't forget me	5/7/2023

Emails (1)

#	Parties	Content
1	Timestamp: 5/7/2023 1:15:10 AM(UTC+0) From: hefner4life@icloud.com Wayne Hefner To: Dianejohn38@outlook.com Direction: Outgoing	Subject: Works Body: Sent from my iPhone Email header: Attachments: New Leads 18-2-2021.xlsx New Leads 18-2-2021.xlsx Body file: mes-1.eml

48. In the conversation below, on July 15, 2023, WAYNE, using 240-906-2525, sent HOT DRUGS, using 876-389-8740, the below image of a receipt from Staples as well as tracking number 1Z5AR4870198952826, which is referenced above in connection with J.P. As documented above, J.P. stated that she was contacted sometime in early 2023 and advised that she won \$5,500,000 in a sweepstakes. J.P. also stated that she lost approximately \$75,000 as part of the scheme.

12409062525@s.whatsapp.net Hefner	18763898740@s.whatsapp.net Hot Drugs - Outgoing	7/15/2023	
	Delivered: 7/15/2023 12:32:40 AM(UTC+0)		
12409062525@s.whatsapp.net Hefner	18763898740@s.whatsapp.net Hot Drugs - Outgoing	1z5ar4870198952826	7/15/2023
	Delivered: 7/15/2023 12:32:44 AM(UTC+0)		

22dc8678-b269-4b98-9204-92a14d479b8f.jpg

Staples
Customer Receipt

OKJ610210

SHIPMENT THROUGH
Staples #0012
7933 Annapolis Road
Lanham, MD 20706
(201) 306-4530

Ship Date: 7/14/2023
Expected Delivery Date: 7/17/2023 11:59 PM
Carrier & Service: UPS Next Day Air

Ship from
Matthew Duncan
12905 Heather Cir
Fort Washington, MD 20744-9337, US
Residential
Telephone: +1 (242) 899-7058

Ship to
[REDACTED]
Oakridge, OR 97463-9507, US
Residential

Shipment Summary

Packages (in shipment): 1
Shipment ID: OKJ610210
POS Number: 6867032472
Weight(Actual): 10.00 lb, Manual Wt

Shipment Charges

Package(s) Charges: \$220.23
Shipment Total: \$220.23

Package 1

Tracking Number: 1Z5AR4870198952826
Package Type: Custom Package
Dimensions: 1.12 in W 12 in H 12 in
Weight(Actual): 10.00 lb, Manual Wt
Content Details: documents

Package 1 Charges

UPS Next Day Air: \$220.23
Package 1 Subtotal: \$220.23

Track Your Shipment
Log on to www.ups.com or contact UPS at 1-800-PACK-UPS.

Suspension of Service Guarantee
Effective March 26, 2023 and until further notice, UPS has suspended the UPS Service Guarantee. Also referred to as the UPS Money Back Guarantee for all shipments from any origin to any destination.

Damaged, Lost or Late Claims
In the event that your package is damaged, lost or late, please contact the Staples Ship Center Claims Department at 1-800-797-9328.
Hours of operation: Monday-Friday, 9 A.M. - 5 P.M. EST.
All UPS claims must be called into the Staples Ship Center Claims Department within the specified time per UPS policy.
Late claims must be reported after the delivery has occurred and within 15 days of the delivery date. Lost claims must be reported within 60 days of the expected delivery date and require proof of value for affected merchandise. Damage claims must be reported within 60 days of the delivery date. All packaging materials as well as the Proof of Value for affected merchandise will be required for damage claims.
Claims take two to six weeks for review and payment (if approved).

By signing the merchant receipt, I understand/agree that:

- I am subject to all Staples and UPS Terms and Conditions. See www.ups.com for further details.
- Staples reserves the right to reject and inspect any package to be shipped.
- Staples will not be liable for damage to packages improperly packed, unless my receipt shows that I paid for Staples to pack the package.
- Staples will not ship any hazardous materials or other restricted items and you affirm that any package you have packed and offered to Staples for shipment does not contain such contents.
- Parcel Insurance
a. I may elect to pay an additional, optional fee (as specified on this receipt) for Staples' parcel insurance which is offered as part of Staples' UPS Ship Center services. Such fees do not include any markup by, or commission payment to, Staples. This insurance does not provide any insurance to you - you are neither an insured nor an additional insured under Staples' parcel insurance.
b. Any claims for damages related to parcel insurance must be pursued in arbitration not in any court proceeding, and must be pursued on an individual basis only, not in any form of class or representative action. Complete terms and conditions regarding individual funding arbitration are available at www.ups.com.
c. Staples' liability on any claim for loss or damage of a package with parcel insurance shall not exceed the lesser of (i) the insured value, (ii) repair cost, (iii) actual loss, (iv) replacement cost, or (v) invoice price (whichever is lowest) of the damaged property (as per loss). In all other cases, Staples' liability shall not exceed UPS's maximum liability for loss or damage under its Terms and Conditions of Service available for review on www.ups.com.
- International packages may be subject to duties, taxes and brokerage fees as determined by the destination country, to be paid by the receiving party.
- I have reviewed the shipment address for accuracy.

By signing the merchant receipt, you acknowledge that Staples will NOT ship any hazardous materials or other restricted items, and you affirm that any package you have packed and offered to Staples for shipment does not contain such contents.

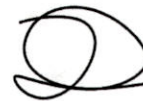
49. During the review of the chats between HOT DRUGS and WAYNE, a WhatsApp chat was recovered in which WAYNE sent “HOT DRUGS”, believed to be FARQUHARSON, the text “Happy birthday” on February 9, 2024. This is consistent with FARQUHARSON’s birthdate based

on the information submitted to DHS and Jet Blue, as described above. The message referenced is shown below:

12409062525@s.whatsapp.net Hefner	18763898740@s.whatsapp.net Hot Drugs Delivered: 2/9/2023 3:37:00 PM(UTC+0)	- Outgoing	Happy birthday
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CONCLUSION

50. Based upon the facts and circumstances contained in this affidavit, your affiant believes there is probable cause to believe that Tavoy **FARQUHARSON** has committed Conspiracy to Commit Mail Fraud, in violation of 18 U.S.C. § 1349.



Digitally signed by
Dennis P. Senft Jr.
Date: 2024.08.02
16:00:34 -04'00'

Dennis Senft
Special Agent
Department of the Treasury,
Office of the Inspector General

Sworn before me, this 5th day of August 2024.



THE HONORABLE CHARLES D. AUSTIN
UNITED STATES MAGISTRATE JUDGE